

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 2:24-cr-00124

LORI BUTTS,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF
DEADLINE TO FILE MOTIONS**

Defendant Lori Butts, by her counsel, Nicole M. Masnica of Gimbel, Reilly, Guerin & Brown LLP, hereby moves the Court for a modification of the text only order entered on January 15, 2025, to file pre-trial motions, extending the defendant's deadline by two weeks to February 21, 2025.

An indictment charging Ms. Butts with eight counts of Health Care Fraud and eight counts of Wire Fraud, was issued in this case on June 25, 2024. (Doc. 1). The Court made a speedy trial finding at a counsel-only scheduling conference held on July 30, 2024, which excluded the 60 days between that hearing and the next, which was held on September 24, 2024. (Doc. 7). At the November 22, 2024, counsel-only scheduling conference, the parties appeared and conferred regarding the deadlines for motions, and the Court adopted the following scheduling order: defense motions were to be due January 17, 2025, the Government's response due by January 31, 2025, and defense reply briefs due by February 7, 2025. (Doc 10).

Based upon the unopposed motion of undersigned counsel (Doc 11), the scheduling order was modified on January 15, 2025 in a text-only order to reflect that motions are to be filed by February 7, 2025, responses by February 21, 2025 and replies by February 28, 2025. (12).

As detailed in prior motions, discovery in this matter includes thousands of pages of records and potentially privileged documents and information that were turned over to the Government by Ms. Butts's prior counsel, review of which was a significant undertaking. Since the last motion for extension of the motions deadline, a privilege log has been completed by the defense and turned over to the Government for review. Additional time is required to ensure the government has sufficient time to review the privilege log in its entirety and for the parties to identify the relevant Bates numbers.

In advance of this motion, undersigned counsel contacted Assistant United States Attorney Carter Stewart to discuss an extension. AUSA Stewart indicated that the Government does not object this motion.

For these reasons, undersigned counsel believes there is good cause to grant the motion for modification of the established scheduling order to the date listed above.

Dated this 7th day of February, 2025.

Respectfully submitted,

GIMBEL, REILLY, GUERIN & BROWN LLP

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